

VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas, 24th Flr.
New York, New York 10020
Telephone: (212) 307-5500
Facsimile: (212) 307-5598
Edward P. Boyle
David N. Cinotti
Michael A. Guerra
*Counsel for Goran Puljic, T.K. Narayan,
and Scott Snell*

HOGUET NEWMAN REGAL & KENNEY,
LLP
10 East 40th Street
New York, New York 10016
Telephone: (212) 689-8808
Facsimile: (212) 689-5101
John P. Curley
*Counsel for Cynthia Zamora Daniel and
Christopher Montalvo*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.**

Chapter 11

**Case No. 08-13555 (SCC)

(Jointly Administered)**

**NOTICE OF STIPULATION AND AGREEMENT,
BETWEEN LEHMAN BROTHERS HOLDINGS INC. AND
GORAN PULJIC, T.K. NARAYAN, SCOTT SNELL, CYNTHIA ZAMORA
DANIEL, AND CHRISTOPHER MONTALVO, AND REVISED PROPOSED
ORDER, CONFIRMING THAT THE AUTOMATIC STAY DOES NOT APPLY TO
SPECIAL PROCEEDING TO STAY ARBITRATION IN NEW YORK STATE COURT**

PLEASE TAKE NOTICE that in connection with the motion of Goran Puljic, T.K. Narayan, Scott Snell, Cynthia Zamora Daniel, and Christopher Montalvo, individuals (“Arbitration Respondents”), by and through their attorneys, Venable LLP and Hoguet Newman Regal & Kenney LLP, for (1) a determination that the automatic stay does not apply, or (2) in the alternative, if the automatic stay applies, granting relief from the automatic stay to permit Arbitration Respondents to file a petition to stay or enjoin an arbitration proceeding Lehman Brothers Holdings Inc. (“LBHI”) commenced before the American Arbitration Association (*see* Docket Nos. 53921, 53923) (the “Motion”), the Arbitration Respondents and LBHI, by and through its attorneys, Paul Hastings LLP, have executed a Stipulation, Agreement, and Proposed

Order (the “Revised Proposed Order”), and hereby respectfully request that the Revised Proposed Order be approved and so ordered by the Honorable Shelley C. Chapman, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, in lieu of the proposed order submitted with the Motion. Arbitration Respondents also respectfully request that the Revised Proposed Order replace the proposed order submitted with the motion to reduce the time to provide notice of the Motion (*see* Docket Nos. 53922, 53923) (the “Motion to Shorten,” and together with the Motion, the “Motions”). Entry of the Revised Proposed Order will resolve both Motions. A copy of the Revised Proposed Order is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures, dated June 17, 2010 [ECF No. 9635], and Bankruptcy Rule 2002, Arbitration Respondents will provide notice of the Revised Proposed Order to (i) counsel for the Lehman Bankruptcy debtors, (ii) the Creditors’ Committee; (iii) the Office of the United States Trustee for the Southern District of New York, and (vi) LBHI’s counsel for the arbitration. In light of the nature of the Revised Proposed Order and relief sought therein, Arbitration Respondents will notify all other parties requesting notice under Bankruptcy Rule 2002 via the ECF Filing System. Arbitration Respondents respectfully submit that no other or further notice need be given and that the notice that Arbitration Respondents will provide is sufficient for purposes of the Revised Proposed Order.

Dated: New York, New York
November 17, 2016

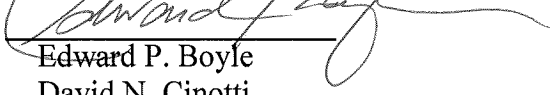
HOGUET NEWMAN REGAL &
KENNEY, LLP

By: /s/ John P. Curley
John P. Curley
10 East 40th Street
New York, New York 10016
Telephone: (212) 689-8808
Facsimile: (212) 689-5101
JCurley@HNRKLaw.com

*Counsel for Cynthia Zamora Daniel and
Christopher Montalvo*

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November 17, 2016

VENABLE LLP

By: 
Edward P. Boyle
David N. Cinotti
Michael A. Guerra
Rockefeller Center
1270 Avenue of the Americas, 24th Flr.
New York, New York 10020
Telephone: (212) 307-5500
Facsimile: (212) 307-5598
Emails:
EPBoyle@Venable.com
DNCinotti@Venable.com
MAGuerra@Venable.com

*Counsel for Goran Puljic, T.K. Narayan,
and Scott Snell*